

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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PROSPECT JV DEVELOPEMENT, LLC, PROSPECT
SHARP, LLC and HS PROSPECT, LLC,

Case No.: 18-cv-05837-WFK-LB

Plaintiffs,

-against-

ILLINOIS UNION INSURANCE COMPANY,

Defendant.

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RULE 26(f) MEETING REPORT

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CASE NAME: Prospect JV Development, LLC, et al. v. Illinois Union Ins. Co.

DOCKET NO.: 18-cv-5837

Have the parties met and conferred? Yes Date? November 15, 2018

Date the Rule 26(a)(1) initial disclosures will be exchanged? November 27, 2018¹

Proposed Discovery Plan

1. Deadline for parties to provide properly executed authorizations/releases: N/A
2. Deadline to join new parties or amend the pleadings: January 7, 2019
3. Should any changes be made in the limitations on discovery imposed under the Federal Rules of Civil Procedure or by local rule?¹ Yes ___ No ✓
4. Deadline to file any protective order: January 7, 2019
5. The parties shall complete all fact discovery by: June 28, 2019
6. The parties shall complete expert discovery, if necessary, by: August 30, 2019
7. The parties shall file any pre-motion conference request by:² September 30, 2019
8. Should the Court hold an early settlement conference in this action?³ Yes ✓ No ___
9. Have the parties agreed to a plan regarding electronic discovery?⁴ Yes ___ No ✓
10. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636?⁵
(Answer no if any party declines to consent without indicating which party has declined)
Yes ___ No ✓

¹ If yes, the parties should be prepared to address the proposed changes at the initial conference.

² The parties are reminded to comply with the individual rules of the presiding district court judge.

³ Prior to the initial conference, counsel shall discuss with their clients and their adversaries whether an early settlement conference, or other form of alternative dispute resolution, is appropriate in this case and be prepared to explain their reasons to the Court.

⁴ If yes, the parties shall file a letter detailing the parties' proposed plan regarding electronic discovery.

⁵ The fillable consent form AO 85 is available at https://www.nyed.uscourts.gov/forms/all-forms/general_forms and must be signed by all parties and filed electronically.

¹ Per 10/22/18 Order, the parties were to exchange initial disclosures by 11/20/18. Due to a personal situation affecting plaintiffs' counsel, the parties have agreed to exchange their initial disclosures by 11/27/18.

Dated: New York, New York
November 20, 2018

Respectfully,

COZEN O'CONNOR

By: /s/ Melissa Brill
Melissa Brill, Esq.
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By: /s/ Daniel J. Scher
(as authorized on November 20, 2018)
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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2018 I electronically filed the foregoing document with the United States District Court Eastern District of New York by using the CM/ECF system.

/s/ Melissa Brill
Melissa Brill